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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

LUIS ORTIZ,	)	Case No.: 2:21-cv-01563-KJM-DMC
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR AN
	)	EXTENSION OF TIME
v.	)	
	)	
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Attorney Fees Pursuant to the Equal Access to Justice Act (EAJA) (ECF No. 30) be extended thirty (30) days from May 27, 2025, up to and including June 26, 2025. This is Defendant's first request for an extension.

Defendant requests this extension because of heavier than usual workloads borne by the undersigned counsel for Defendant. This includes being reassigned multiple matters from other attorneys who have departed the Defendant agency. For some of these, the merits deadlines had already been extended. Additionally, the undersigned was assigned to handle an in-person

1 evidentiary hearing held on May 15, 2025, which required travel outside of his home city and  
2 absence from the office for an entire day. Moreover, the undersigned has seven pending  
3 deadlines for merits briefs in the next 30 days.

4 Accordingly, additional time is needed to formulate Defendant's response to Plaintiff's  
5 Motion.

6 The parties further stipulate that the Court's Scheduling Order shall be modified  
7 accordingly.

8 Respectfully submitted,

9 Dated: May 23, 2025

10 /s/ Eddy Pierre Pierre  
11 (\*as authorized via e-mail on May 23, 2025)  
EDDY PIERRE PIERRE  
Attorney for Plaintiff

12 Dated: May 23, 2025

13 Michelle Beckwith  
14 Acting United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
15 Social Security Administration

16 By: /s/ Timothy A. Razel  
17 TIMOTHY A. RAZEL  
18 Special Assistant U.S. Attorney  
19 Attorneys for Defendant  
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**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including June 26, 2025, to respond to Plaintiff's Motion for Attorney Fees Pursuant to the EAJA.

Dated: May 28, 2025

A handwritten signature in dark ink, appearing to read "Dennis M. Cota", written over a horizontal line.

DENNIS M. COTA  
UNITED STATES MAGISTRATE JUDGE